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December 19, 2025

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United States v. Shares of 21 East 61st Street Apartment Corp. et al.
Civil Docket No. 24-2147

Dear Ms. McGrath:

We write as counsel to claimants Lovitas, Inc., Baloas, Inc. and Dr. Hak Seon Kim (the "Claimants"). In accordance with the Court's Individual Practice Rules, Claimants are serving their Motion to Dismiss. The motion papers consist of the following:

- Claimants' Notice of Motion to Dismiss the Complaint;
- Claimants' Memorandum of Law in Support of their Motion to Dismiss;
- Declaration of Douglas Kellner with accompanying exhibits;
- Declaration of Sunny Hathiramani with accompanying exhibits;
- Declaration of Mergen Baasandorj.

Yours truly,



Douglas A. Kellner
Attorneys for Claimants

Copies to: All Counsel of Record (via CM-ECF)